

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

KIRK DAHL, et al., Individually and on Behalf)	Lead Case No. 1:07-cv-12388-WGY
of All Others Similarly Situated,)	
Plaintiffs,)	<u>CLASS ACTION</u>
vs.)	NAMED PLAINTIFFS' MOTION FOR
BAIN CAPITAL PARTNERS, LLC, et al.,)	FINAL APPROVAL OF SETTLEMENTS
Defendants.)	AND SUPPLEMENTAL PLAN OF
_____)	ALLOCATION OF SETTLEMENT
	PROCEEDS

Plaintiffs Kirk Dahl, Police and Fire Retirement System of the City of Detroit, City of Omaha Police and Fire Retirement System, and Michael Wojno, as Executor for the Estate of Robert Zimmerman (collectively, “Named Plaintiffs”), on behalf of the Settlement Class and pursuant to Rule 23 of the Federal Rules of Civil Procedure, respectfully move this Court to enter orders and/or judgments: (1) granting final approval of the settlements of this class action; and (2) approving the Supplemental Plan of Allocation of Settlement Proceeds.

This motion is based on the Memorandum of Law in Support of Named Plaintiffs’ Motion for Final Approval of Settlements and Supplemental Plan of Allocation of Settlement Proceeds, the declarations submitted in support thereof, the Settlement Agreements and related exhibits previously filed with the Court (Dkt. Nos. 986, 997, 1018 and 1037), all other pleadings and matters of record, and such additional evidence or argument that may be presented at the hearing on this matter.

DATED: November 13, 2014

Respectfully submitted,

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LOCAL RULE 7.1(a)(2) CERTIFICATION

I certify that I have conferred with counsel for Settling Defendants on the issues raised by this motion prior to filing, and Settling Defendants do not oppose the relief sought in the motion for approval of the Settlements, and take no position on the portion of the motion seeking approval of the proposed Plan of Allocation.

s/ David W. Mitchell

DAVID W. MITCHELL

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 13, 2014.

s/ DAVID W. MITCHELL

DAVID W. MITCHELL